

REMARKS

Applicant appreciates the time taken by Examiner Qing-Yuan Wu to review Applicant's present application. This application has been carefully reviewed in light of the Official Action mailed September 10, 2007 ("Office Action"). This Reply encompasses a bona fide attempt to overcome the rejections raised by Examiner Qing-Yuan Wu and presents amendments as well as reasons why Applicant believes that the claimed invention, as amended, is novel and nonobvious over the applied prior art. Accordingly, Applicant respectfully requests reconsideration and favorable action in this case.

Claim Status

Claims 1-27 were pending. Claims 1-27 were rejected. Claims 1, 3-6, 9, 11-14, 17-18, 20-24 and 27 are amended herein. Support for the claim amendments can be found in the Specification as originally filed. Particularly, support for amendments to claim 1, 9, 17 and 27 can be found in paragraphs 0026-0028, support for amendments to claim 3, 11 and 21 can be found in paragraphs 0031 and 0035, support for amendments to claim 4, 12 and 22 can be found in paragraph 0031, support for amendments to claim 5, 13 and 23 can be found in paragraph 0041 and support for amendments to claim 6, 14 and 24 can be found in paragraph 0029. No new matter is introduced. Through these changes, claims 1-27 are pending.

Rejections under 35 U.S.C. § 112

Claims 5-8, 13-16 and 23-27 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Claims 5, 13 and 23 are amended herein without prejudice or disclaimer. Applicant respectfully submits that claims 5, 13 and 23 comport with the requirements of 35 U.S.C. § 112. Claims 6-8, 14-16 and 24-27 are likewise submitted to comport with the requirements of 35 U.S.C. § 112. Accordingly, withdrawal of this rejection is respectfully requested.

Rejections under 35 U.S.C. § 103

Claims 1-2, 9-10, and 17-19 were rejected under U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,516,356 ("Belknap") in view of Applicant Admitted Prior Art ("AAPA").

First and foremost, this reply incorporates the previously submitted arguments with regard to the Belknap reference. Applicant respectfully disagrees that Belknap can be properly combined with the teaching set forth in the Background section of Applicant's disclosure or that the combination of Belknap and the Background section of Applicant's disclosure suggests claims 1-27 for various reasons as submitted before. For example, there was no apparent reason that would have motivated one skilled in the art to modify Belknap so as to arrive at the invention as claimed in claims 1-27. Even if the teachings of the Background section of Applicant's disclosure and Belknap are combinable, the combination does not teach all the limitations as set forth in the claims. As a good faith attempt to expedite prosecution, claims 1, 9, 17 and 27 are amended herein to further point out and specifically claim the subject matter which Applicant regards as the invention. Note that the amendments were made to make the implicit explicit.

For example, claim 1 as amended herein recites:

A system for interfacing applications comprising computer executable software instructions stored on a computer readable memory, said computer executable software instructions operable to implement:

a public application program interface (public API) layer useful for writing applications consistent with a set of heterogeneous vendor-specific workflow engines,

wherein each workflow engine is a software program operable to manipulate content items in accordance with a process definition,

wherein said public API layer includes a set of generic objects representing functional characteristics common to said set of heterogeneous vendor-specific workflow engines,

wherein each of said set of generic objects is a self-contained data entity, and wherein each of said vendor-specific workflow engines comprises an engine-specific API; and

an API adapter layer having a plurality of adapters for translating instructions from said public API layer to vendor-specific instructions,

wherein each adapter is configured to interface with a workflow engine application program interface (workflow engine API),

wherein each workflow engine API is associated with an underlying workflow engine of said set of heterogeneous vendor-specific workflow engines, and

wherein each adapter is operable to map said set of generic objects to a set of native objects for a corresponding underlying workflow engine.

Thus, specific embodiments of claim 1 comprise a public API layer which may interact with various applications. The public API includes a set of generic objects which may have functionality and may be utilized in interactions with applications. Underlying the public API layer are, in one embodiment, vendor-specific workflow engines and each workflow engine may have an engine-specific or native API associated with it. Each native API associated with a particular workflow engine comprises a set of native objects. Thus, claim 1 teaches a system having a public API layer having a set of generic objects and a native API layer comprising several native APIs, each native API having a set of native objects. To bridge the gap between the generic objects in the public API layer which interacts with applications and the native objects in the native APIs associated with underlying workflow engines, each native API corresponds to an API adapter in an API adapter layer in the system of claim 1. Adapters in the API adapter layer map generic objects in the public API layer to native objects of a native API associated with an underlying workflow engine, thus allowing applications to use the underlying workflow engines via interactions with the public API layer.

By contrast, Belknap teaches a system for accessing media in which a requesting application (8) is coupled to a high level command processor (10) containing a common API which is a pool of a number of individual APIs such that the requesting application can send commands to the common API. See Belknap, column 3, lines 25-35. It appears that each API in the common API enables functionality with regard to media (e.g., READ, RETRIEVE, etc.). The common API translates the desired functionality of its constituent APIs from application commands into specific actions that are mapped to device-level commands. See Belknap, column 5, lines 1-25 and column 6, lines 30-40. Thus Belknap teaches a common API (e.g., a single API) formed from constituent APIs. Accordingly, Belknap teaches a single API layer which translates commands issued by a requesting application into specific actions that are mapped to device-level commands.

Embodiments as recited in claim 1 differ from Belknap at least because Belknap does not teach or suggest a public API layer comprising generic objects or an API adapter layer having a plurality of adapters, each adapter corresponding to a workflow engine API. That is, embodiments as claimed in claim 1 allow various applications to interact with vendor-specific workflow engines. See Specification, e.g., figure 3. Note that workflow engines are software programs operable to manipulate content items. By contrast, Belknap does not teach workflow engines. The common API of Belknap converts high-level generic commands from a requesting application to device-level commands for media devices. Note that these media

devices do not appear to be vendor-specific as they are all managed by a single media manager 5. Thus, although these media devices may be different, they do not have interoperability problems as discussed in AAPA. Since Belknap does not address the interoperability of proprietary workflow engines of various organizations and/or businesses, there was no apparent reason that would have prompted one skilled in the art at the time the invention was made to modify Belknap with AAPA, particularly in light of the fact that neither Belknap nor AAPA suggests such a modification.

Claim 1 further recites an API adapter layer having a plurality of adapters operable to map generic objects in the public API layer to native objects in the native APIs. See Specification, figure 3. By contrast, Belknap does not teach or suggest such an API adapter layer.

For at least the above reasons, claim 1 and dependent claims 2-8 are submitted to be patentable under 35 U.S.C. § 103 over the combination of Belknap and AAPA. If an independent claim is nonobvious under 35 U.S.C. § 103, then any claim depending therefrom is nonobvious. *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988). For similar reasons, claims 9, 17 and 27 and dependent claims 10-16 and 18-26 are also submitted to be patentable over the combination of Belknap and AAPA. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 5-7, 13-15, 20, 23-25 and 27 were rejected under U.S.C. § 103(a) as being unpatentable over Belknap and AAPA as applied to claims 1, 9 and 17 and further in view of U.S. Publication No. 20020133635 ("Schechter").

Applicant respectfully submits that the cited portions of Schechter do not remedy the above-discussed deficiencies of Belknap and AAPA and that claims 5-7, 13-15, 20, 23-25 and 27 are patentable under 35 U.S.C. § 103 over the combination of Belknap, AAPA and Schechter. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 8, 16, 21-22, and 26 were rejected under U.S.C. § 103(a) as being unpatentable over Belknap, AAPA, and Schechter as applied to claim 20 and further in view of U.S. Patent No. 6,647,396 ("Parnell").

Applicant respectfully submits that the cited portions of Parnell do not remedy the above-discussed deficiencies of Belknap, AAPA and Schechter and that claims 8, 16, 21-22 and 26 are patentable under 35 U.S.C. § 103 over the combination of Belknap, AAPA, Schechter and Parnell. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 3-4 and 11-12 were rejected under U.S.C. § 103(a) as being unpatentable over Belknap and AAPA as applied to claims 1 and 9 and further in view of Parnell.

Applicant respectfully submits that the cited portions of Parnell do not remedy the above-discussed deficiencies of Belknap and AAPA and that claims 3-4 and 11-12 are patentable under 35 U.S.C. § 103 over the combination of Belknap, AAPA and Parnell. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicant has now made an earnest attempt to place this case in condition for allowance. Other than as explicitly set forth above, this reply does not include any acquiescence to statements, assertions, assumptions, conclusions, or any combination thereof in the Office Action. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests full allowance of claims 1-27. The Examiner is invited to telephone the undersigned at the number listed below for prompt action in the event any issues remain.

The Director of the U.S. Patent and Trademark Office is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 50-3183 of Sprinkle IP Law Group.

Respectfully submitted,

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